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UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re: DEEP VEIN THROMBOSIS LITIGATION

MDL No. 1606 VRW

This Document Relates to:

All Warsaw Cases

STIPULATION AND
~~PROPOSED~~ ORDER TO
 EXTEND PLAINTIFF'S
 TIME TO FILE MOTION
 FOR SUMMARY
 JUDGMENT OPPOSITION
 DECLARATIONS EX POST
 FACTO

This stipulation is entered into by and between the Warsaw Case Plaintiffs represented by the law offices of O'Reilly, Collins & Danko, and the Warsaw Case Defendants by agreement through the Law Offices of Sara A. Simmons, by agreement of the Warsaw Case Defendants for this stipulation, with respect to the following:

1. The Warsaw plaintiffs' opposition to defendants' motion for summary judgment was due on October 31, 2005, pursuant to the Court's briefing schedule set on June 21, 2005;

STIPULATION AND ~~PROPOSED~~ ORDER TO EXTEND PLAINTIFF'S TIME
 TO FILE MOTION FOR SUMMARY JUDGMENT
 OPPOSITION DECLARATIONS EX POST FACTO

2. Plaintiffs' attorney's were unable to file certain declarations and/or exhibits as set forth at page 13, line 15 through page 14, line 20, in the Warsaw Defendants' Objection to Plaintiffs' "Evidence" Proffered In Opposition to Motions for Summary Judgment filed with the Court on November 15, 2005.

3. The declarations and/or exhibits instead were filed on or about November 1, 2005, as a result of mistake, inadvertence or excusable neglect.

4. The parties further stipulate that the Court may extend, ex post facto, plaintiffs' time to have filed the above-referenced declaration, and/or exhibits to and including November 1, 2005.

STIPULATED AND AGREED TO:

O'REILLY COLLINS & DANKO

Dated: 11/22/05

By 

Stephen J. Purtill, Esq.
Attorney for Plaintiffs

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STIPULATION AND [PROPOSED] ORDER TO EXTEND PLAINTIFF'S TIME
TO FILE MOTION FOR SUMMARY JUDGMENT
OPPOSITION DECLARATIONS EX POST FACTO

LAW OFFICES OF

O'REILLY, DANKO & TAMANE
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TELEPHONE (650) 124-1500

LAW OFFICES OF SARA A. SIMMONS

Dated:

11/22/05

By

Sara A. Simmons

Sara A. Simmons, Esq.

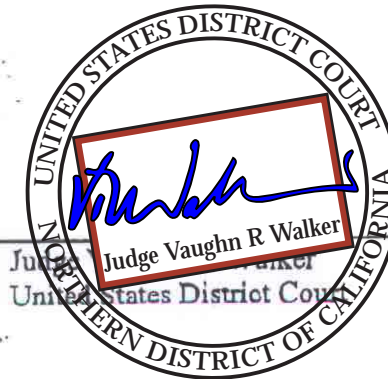
Attorneys for Defendant ALASKA AIRLINES, INC., in accordance with General Order No. 45, Ms. Simmons represents that she has been authorized by counsel representing the following defendants to enter this stipulation on behalf of the Warsaw Defendants: American Airlines, Inc., Spirit Airlines, Inc., Continental Airlines, Inc., United Air Lines, Inc., UAL Corporation, Miami Air International, Inc., Skywest Airlines, Inc., US Airways, Inc., Societe Air France, Air New Zealand Ltd., British Airways Plc, El Al Israel Airlines, Japan Air Lines, Ltd, KLM Royal Dutch Airlines, Lufthansa German Airlines, Qantas Airways Limited, Singapore Airlines Limited, South African Airways and Virgin Atlantic Airways.

ORDER

IT IS SO ORDERED.

Dated: November 29, 2005

By



STIPULATION AND [PROPOSED] ORDER TO EXTEND PLAINTIFF'S TIME TO FILE MOTION FOR SUMMARY JUDGMENT OPPOSITION DECLARATIONS EX POST FACTO